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September 22, 2023

The Honorable Paul A. Engelmayer, U.S.D.J.  
40 Foley Square  
New York, New York 10007

**RE:** *Alexander Norris v. Marc Goldner, et al.*  
Case No. 19-cv-5491 (PAE)(SN)

Dear Judge Engelmayer:

As Your Honor is aware, we represent Plaintiff Alexander Norris (“Plaintiff”) in the above-referenced action. We jointly write today with Defendants Marc Goldner (“Goldner”), Golden Bell Entertainment, LLC (“Golden Bell Entertainment”) and Golden Bell Studios (“Golden Bell Studios”) (collectively, “Defendants”)’s to request an extension of the parties’ time to submit: 1) a joint pre-trial order; 2) motions in limine; and 3) opposition to any motions in limine.

The parties request that the deadline for the submission of a joint pre-trial order and submission of the parties’ motions in limine be extended from September 26, 2023 to November 2, 2023, and that the deadline for the submission of any oppositions to motions in limine be extended from October 3, 2023 to November 9, 2023. The reason for the extension is that the parties are scheduled to appear before Judge Netburn on October 19, 2023 at 3:00 P.M. for a Status Conference (Doc. No. 153). At the Status Conference, Plaintiff intends to conference with Judge Netburn a path to resolution which would ultimately result in the parties avoiding a costly trial on Plaintiff’s remaining contract claims. Should the parties not reach a resolution, the parties’ proposed schedule would proceed with the submission of pre-trial filings in short order. Although the parties have not sought a prior extension of these deadline, the Court sua sponte extended these deadlines. (Doc. No. 154). Plaintiff has conferred with Defendants and they consent to the relief sought.

The parties are thankful to the Court for its attention to this matter.

Sincerely,  
/s/ Christie R. McGuinness  
Christie R. McGuinness  
Francelina M. Perdomo Klukosky

CC: All Counsel Via ECF.